

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

COMPETITIVE PRODUCTS PRICE CHANGES
RATES OF GENERAL APPLICABILITY

DOCKET NO. CP2013-3

INITIAL COMMENTS AND MOTION OF DAVID B. POPKIN

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Respectfully submitted,

PRCCOMMENTSCP20133

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1. In Section 2635.2 of the Mail Classification Schedule, the Postal Service proposes a Shipping Fee of 0.00 to 25.00. In actuality, the Postal Service is proposing a fee of \$2.50 for the expedited shipment of Priority and Express Mail shipping containers.

If the specific rate will be \$2.50, then why is the Postal Service proposing a range of rates?

I have a question regarding the three ranges that are shown in the same table for MAILERS, CARTONS, and SUPPLIES with prices that range from 39 cents to twenty-five dollars. Is this for the READY POST supplies that already are available for purchase? Please confirm that it does NOT apply to the various envelopes, boxes, and mailing tape that are designed for Priority Mail and Express Mail and are presently provided FREE OF CHARGE and that these items will continue to be provided free of charge.

2. The Postal service is proposing to increase the rates for Priority Mail. There are four rates for flat-rate boxes/envelopes that are similar to each other and have rates that are close to each other, namely

Regular flat-rate envelopes	\$5.60
Legal size flat-rate envelopes	\$5.75
Small size flat-rate box	\$5.80
Padded flat-rate envelope	\$5.95

This will provide a confusing rate schedule and these four items should have the same price.

3. On October 24th the Postal Service provided information on the rates that will be charged for competitive Post Office Boxes. The rates have been provided in ranges and have been filed under seal. The concept of filing for rates in a range of values is inappropriate. If one were to take that to the limit, the Postal Service could just file for any and all of their rates as from \$0.00 to \$5000.00 and then just be done with any filings so long as they were in that range.

Filing the rates under seal was done on the basis that competitors could change their rates in response to the Postal Service's proposed rates. Why are Post Office Box rates any different than any of the other Competitive rates? The Postal Service could file its entire proposal under seal. The Postal Service wants to maintain the Post Office Box rates under seal for a period of ten years. Does that mean that I have to pay my box rent next year under the new rates with a blank check which the Postal Service will deposit so that my bank will take some unspecified money from my account and not make it known to me?

I move that the Postal Service be required to provide specific rates and to do so unsealed.